

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

EDGAR ITURBIDE, on behalf of himself and  
others similarly situated,

Plaintiff,

v.

CHO FAMILY DYNASTIA, INC. d/b/a FLOR  
DE MAYO, FLOR DE MAR, INC., d/b/a FLOR  
DE MAYO, MARVIN CHU, DENNIS CHU and  
NELSON CHO,

Defendants.

Case No.: 17 CV 0596

Netburn, M.J.

**NOTICE OF PLAINTIFF'S  
UNOPPOSED MOTION FOR  
APPROVAL OF ATTORNEYS'  
FEES, ADMINISTRATION FEES  
AND REIMBURSEMENT OF  
EXPENSES**

For the reasons set forth in (i) the Memorandum of Law in Support of Plaintiff's Unopposed Motion for Approval of Attorneys' Fees and Reimbursement of Expenses and (ii) the Declaration of C.K. Lee in Support of Plaintiff's Unopposed Motion for Approval of Attorneys' Fees, Administration Fees and Reimbursement of Expenses and Unopposed Motion for Approval of Class Representative Service Award, and the exhibits attached thereto, Plaintiff respectfully requests that the Court enter an Order: (1) awarding Class Counsel \$100,000 in attorneys' fees, which is approximately one-third of the Settlement Fund established by Defendants, plus costs and expenses in the amount of \$2,275, to be paid from the Settlement Fund; and (2) awarding Advanced Litigation Strategies, LLC, as Settlement Administrator, administration fees of \$25,000 to be paid from the Settlement Fund.

Dated: January 5, 2018

Respectfully submitted,

LEE LITIGATION GROUP, PLLC

By: /s/ C.K. Lee

C.K. Lee (CL 4086)  
30 East 39<sup>th</sup> Street, Second Floor  
New York, NY 10016  
Tel.: 212-465-1188  
Fax: 212-465-1181  
*Attorneys for Plaintiff, FLSA Collective  
Plaintiffs and the Class*